

**Before the**  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	
To Ensure Compatibility with	)	CC Docket No. 94-102
Enhanced 911 Emergency Calling Systems	)	
	)	
	)	

To the Chief, Wireless Telecommunications Bureau:

Comments of  
TRAXSIS, INC.

Washington Federal Strategies on behalf of Traxis, Inc.<sup>1</sup> hereby respectfully submits these Comments in response to a Public Notice issued by the Wireless Telecommunications Bureau of the FCC, DA 01-1645, released July 13, 2001 which sought comment on a Wireless E911 Phase II amended waiver request filed by D&E Omnipoint Wireless Joint Venture, L.P. These Comments generally support the request for waiver, to the extent that the grant of a waiver will encourage the adoption of E911 Phase II solutions more rapidly by allowing flexibility in the solutions adopted.

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<sup>1</sup> Traxis, Inc. is a software company based in Burlingame, California. Its founders worked together at the Stanford University GPS Lab before founding the company. The company used their knowledge of precise location determination to develop the current ALI solution. The company's website is [www.traxis.com](http://www.traxis.com).

## I. Statement of Interest

Traxis, Inc. is a company that has developed a software solution that wireless carriers can use to comply with Phase II Automated Location Information requirements. Traxis's solution is available either as an application service provided by Traxis or as an addition to the carrier's infrastructure. The Traxis system utilizes multiple sensor measurements to produce a hybrid solution that offers superior accuracy and availability. The solution that Traxis has developed, and continues to develop, works with CDMA, GSM, and TDMA wireless systems.

As a company that develops solutions to address wireless carriers need to comply with the Commission's E911 regulations, Traxis encourages the Commission to act in this matter in a way that fosters the deployment of E911 solutions.

## II. Discussion

In the Commission's Fourth Memorandum Opinion and Order in CC Docket No. 94-102<sup>2</sup>, the FCC determined that it was appropriate to grant to VoiceStream Wireless a waiver of its E-911 Phase II rules. The waiver accelerated the time allowed for activating handsets that could send automatic location information. At the same time, the waiver permitted less accurate position information to be used by the system. The Commission reasoned that grant of this waiver request was in the public interest since it determined

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<sup>2</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket 94-102, Fourth Memorandum Opinion and Order, 15 FCC Rcd. 17442 (2000)

that VoiceStream would provide better Phase II ALI sooner. Further, the grant of the waiver acted to encourage carriers to be flexible in their approaches to complying with the Commission's E-911 requirements, to use both handset and network based solutions, and generally to consider a range of options in attempting to improve the safety of the public.

Traxis supports the concept of flexible solutions to the Phase II ALI requirements. Traxis's technology, using multiple sources of position data, can provide very accurate position information to the wireless carrier or to the PSAP directly. What Traxis has learned in developing its E-911 solution is that different circumstances require different technological solutions. Traxis hopes to work with carriers in all settings to provide the location information that the carriers and PSAPs will need to provide timely police, fire and rescue support to E-911 callers.

Traxis can customize its solution to the needs of each carrier, and it is prepared to work with carriers immediately to help them to comply with the Commission's requirements. While this technology has been designed to address the needs of a range of geographic areas and other situations, it is possible that some part of the Commission's requirements may be difficult to achieve in all settings. For example, deep inside an underground garage, it may be difficult to provide precise location information. Traxis hopes that the Commission will encourage carriers to adopt solutions, even when the solution is not perfect.

### III. Conclusion

Accordingly, Traxis respectfully submits these comments in support of the waiver request filed by D&E Omnipoint Wireless Joint Venture, L.P.

*Respectfully Submitted*

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